

EXHIBIT 2

JANET, JENNER & SUGGS, LLC PLAINTIFFS' PROPOSED DISCOVERY SCHEDULE

Mindful of the fact that the Court has already had a case become trial ready, entertained many of the motions contemplated, and the fact that despite obvious case specific differences, fundamentally the cases share common fact and legal issues, Plaintiffs' counsel proposes the following schedule, which they will litigate with the need for little if any assistance from the PSC:

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| 1. Close of fact discovery | <u>January 23, 2017</u> |
| 2. Affirmative experts disclosed | <u>January 30, 2017</u> |
| 3. Rebuttal experts disclosed | <u>February 13, 2017</u> |
| 4. Close of expert discovery | <u>April 17, 2017</u> |
| 5. Dispositive motions, <i>Daubert</i>
motions in limine | <u>May 8, 2017</u> |
| 6. Trial ready | <u>June 26, 2017</u> |